

I am, in principle, agreed with the provisions of RM-10740. However, I believe that the bandwidth restrictions are more restrictive than necessary. In fact, many of the older SSB transmitters and transceivers have filters installed which are somewhat wider than the 2.8 KHz maximum requirements of the petition for rule making. To require a bandwidth as narrow as 2.8 KHz would require modification of a substantial number of units now in general use. Also, there are a number of newer units that would require modification to meet the 2.8 KHz requirements.

Because of the wider bandwidths of this equipment, I would propose that the permitted bandwidth be increased to 3.5 KHz maximum. Of course, there are many units now in use that have bandwidths more in the 2.1 KHz to 2.4 KHz range. But, by allowing a maximum of 3.5 KHz bandwidth, virtually all of the older equipment will meet these requirements with no problems at all.

For "AM" (actually carrier present double-sideband amplitude modulated transmissions), reducing the bandwidth to 5.6 KHz would place an undue bandwidth requirement on the vast majority of units now in use. Most of this equipment consists of transmitters that were manufactured during the 1950s and 1960s and are being used by stations operating for "nostalgia" purposes. Since most of this equipment has a nominal frequency response in the audio sections that are in the 3 KHz range, this results in signals that have a maximum bandwidth of greater than 5.6 KHz.

I thus propose that the bandwidth for "AM" operation be limited to a maximum of 7 KHz (this being "twice" the bandwidth allowed for SSB operations).

Also, I am not pleased by the situation caused by a very small number of amateur radio operators that has resulted in this petition being offered in the "first place"! However, I do realize that the very "wide" bandwidths being utilized by those operators trying to increase the quality of their SSB transmissions has required action to be taken by the Commission. SSB was NOT designed for "broadcast quality" communications but was designed to maximize communications quality with the resulting "loss" of frequency response. "Normal" SSB transmissions are perfectly understandable although not necessarily "life-like" in the frequency response.

I would also propose that the bandwidth restrictions be limited to all "phone" frequencies below 29 MHz. Also, that they be limited in the frequency bands 50.1 to 51.0 MHz and 144.1 to 145.0 MHz. This will allow the wider bandwidths in the 29.0 to 29.7 MHz range, 51.0 to 54.0 MHz, 145.0 to 148.0 MHz, and on all frequencies above 222 MHz. Thus the wider bandwidth SSB signals would be in the same frequency ranges as "normal" +/- 5 KHz deviation FM operation.

With the above listed modifications, I offer my support of the petition for rulemaking.